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Chamberlain

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL RICHARD LYNCH AND
STEPHEN KEITH CHAMBERLAIN

Defendants.

CASE NO. 3:18-cr-00577-CRB

**DECLARATION OF GARY S.
LINCENBERG IN SUPPORT OF
DEFENDANT STEPHEN
CHAMBERLAIN'S MOTION IN LIMINE
TO EXCLUDE IRRELEVANT
PREJUDICIAL DOCUMENTS
PURSUANT TO FEDERAL RULE OF
EVIDENCE 403**

Assigned to Hon. Charles R. Breyer

DECLARATION OF GARY S. LINCENBERG

I, Gary S. Lincenberg, declare as follows:

1. I am an active member of the Bar of the State of California and a partner with Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow PC, attorneys of record for Defendant Stephen Keith Chamberlain in this action. I make this declaration in support of Mr. Chamberlain's Motion in Limine to Exclude Irrelevant and Prejudicial Documents Pursuant to Federal Rule of Evidence 403. Except for those matters stated on information and belief, I make this declaration based upon personal knowledge and, if called upon to do so, I could and would so testify.

2. Attached as **Exhibit 1** is a true and correct copy of the document the Government has marked as Trial Exhibit 1763 in the current version of its exhibit list.

3. Attached as **Exhibit 2** is a true and correct copy of the document the Government has marked as Trial Exhibit 735 in the current version of its exhibit list.

4. Attached as **Exhibit 3** is a true and correct copy of the document the Government has marked as Trial Exhibit 3305 in the current version of its exhibit list.

5. Attached as **Exhibit 4** is a true and correct copy of the document the Government has marked as Trial Exhibit 3308 in the current version of its exhibit list.

6. Attached as **Exhibit 5** is a true and correct copy of the document the Government has marked as Trial Exhibit 14221 in the current version of its exhibit list.

7. Attached as **Exhibit 6** is a true and correct copy of the document the Government has marked as Trial Exhibit 15296 in the current version of its exhibit list.

8. Attached as **Exhibit 7** is a true and correct copy of the document the Government has marked as Trial Exhibit 15298 in the current version of its exhibit list.

9. Attached as **Exhibit 8** is a true and correct copy of the document the Government has marked as Trial Exhibit 15299 in the current version of its exhibit list.

10. Attached as **Exhibit 9** is a true and correct copy of the document the Government has marked as Trial Exhibit 15300 in the current version of its exhibit list.

11. Attached as **Exhibit 10** is a true and correct copy of the document the Government

1 has marked as Trial Exhibit 15303 in the current version of its exhibit list.

2 12. Attached as **Exhibit 11** is a true and correct copy of the document the Government
3 has marked as Trial Exhibit 16196 in the current version of its exhibit list.

4 13. Attached as **Exhibit 12** is a true and correct copy of the document the Government
5 has marked as Trial Exhibit 816 in the current version of its exhibit list.

6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct, and that I executed this declaration on January 17, 2024, at Los
8 Angeles, California.

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Gary S. Lincenberg